

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B., D.P.,
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI
NC, LLC, RED ROOF
FRANCHISING, LLC, RRI WEST
MANAGEMENT, LLC, VARAHI
HOTEL, LLC, WESTMONT
HOSPITALITY GROUP, INC., and
RRI III, LLC,

Defendants.

PL Sum. J.
Ex. 080

CIVIL ACTION FILE NO.

1:20-cv-5263-MHC JURY

TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF R.P.'S SUPPLEMENTAL OBJECTIONS AND
RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST
INTERROGATORIES**

Plaintiff R.P. (“R.P.” or “Plaintiff”) hereby provides supplemental objections and responses to Defendant Red Roof Inns, Inc.’s First Interrogatories (the “Interrogatories”). Plaintiff reserves the right to amend and supplement these responses as discovery progresses. Plaintiff states that, in these responses, she provides the identity of Victims of Sex Trafficking only subject to the Court’s June 4, 2021 Protective Order (Doc. 74). Under this Order,

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information requested as easily as Plaintiff. Likewise, to the extent Defendants produce documents that contain, reflect, or substantiate any facts or issues in this case, the information Defendants request is within Defendants' possession, custody and control.

INTERROGATORY NO. 12: Please provide a timeline of your Trafficking Occurrences at RRI Smyrna and RRI Atlanta from 2012-2017, with specific reference to the day, month, year. For each occurrence identified, please include: the location of each Trafficking Occurrence; the identity of the organization trafficking you; the name and role of every individual trafficker that assisted or facilitated trafficking you; the names and roles of every hotel personnel, agent, or otherwise that in any way assisted or facilitated each Trafficking Occurrence; the means employed to prevent you from leaving; which, if any, of the other Plaintiffs to this lawsuit that were also trafficked at the same location for each Trafficking Occurrence; and the names of other victims or witnesses with knowledge for each Trafficking Occurrence.

RESPONSE TO INTERROGATORY NO. 12: Plaintiff objects to this Interrogatory to the extent it calls for information that is protected by the attorney-client privilege, work product doctrine, or any other privilege. Plaintiff will not reveal such information. And Plaintiff objects to this Interrogatory to the extent it calls for information that is not in Plaintiff's possession, custody or control.

Subject to these objections, the foregoing objections to definitions and instructions, Plaintiff refers Defendant to her response to Interrogatory No. 9. Plaintiff further provides the following description of her trafficking:

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R.P. was trafficked for sex from about 2012 through 2018. She met her first pimp

From about 2012 through 2014, a trafficker named [REDACTED] trafficked R.P. at the Smyrna RRI. Starting about 2015 through 2016, a trafficker named [REDACTED] trafficked her here. R.P. was at this hotel often, usually staying at least three days each time, but on average at least a week each time. She recalls her longest stay being a month at this hotel. When she was trafficked at this hotel, she would see more than 10 buyers each day. And between 2015 and 2016, she was there at least eight different times.

When renting rooms at this hotel, R.P. believes her trafficker would occasionally have her use her own, real name, but not often. Usually someone else would handle the room rental. And the trafficker generally paid for the room in cash.

Signs of prostitution and trafficking were obvious at this hotel. For example, R.P. saw numerous other sex trafficking victims at this hotel when she was there. She knew they were sex trafficking victims because they showed clear signs. They were often scantily dressed. They usually would follow their traffickers around and would not look other men in the eye.

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Some had signs of physical abuse as well. And the sex traffickers were also openly walking around this hotel, flaunting their business. In addition, the trashcans in her room would fill with used condoms.

Other victims at this hotel included a woman named “Star,” who shared a room with R.P. for two weeks. The following other individuals were also victims trafficked at this hotel, thought R.P. does not have personal knowledge of these names: [REDACTED]

[REDACTED]

[REDACTED].

R.P.’s trafficking at the RRI Atlanta took place between about 2012 and 2018. She believes she was at this hotel more than ten times, and again, would stay as long as two weeks at a time. Her shortest stay at this hotel was between one and three days. And like at the Smyrna RRI, here, R.P. would be forced to have sex with at least 10 buyers a day.

R.P.’s traffickers imposed a quota, requiring her to make between \$600 and \$900 each day. R.P. was also required to give all the money collected to her traffickers.

INTERROGATORY NO. 13: Please identify and describe in reasonable detail every injury, illness, condition, inability to function, diagnosis received (from any individual or facility

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JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

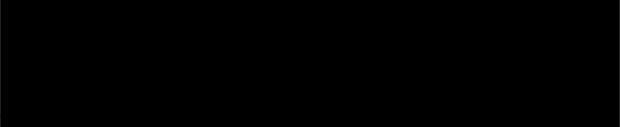
VERIFICATION

The answers set forth in **PLAINTIFF R.P.'S SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS,
INC.'S FIRST INTERROGATORIES** are true and correct to the best of my
knowledge, information and belief based on the information currently
available to me. I reserve the right to make changes to these Objections and
Responses if it appears that an error or omission has been made therein or if
more information becomes available.

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I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to interrogatories is true and correct to the best of my knowledge, information and belief.

This 13 day of April, 2022.

R.P.
A large rectangular area of the document has been completely blacked out, likely redacting a signature. Above this redacted area, the number "21" is handwritten in blue ink.